

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO

EASTERN DIVISION

1:18 MC

19

IN RE: SEIZURE OF
\$9,710.00 IN U.S. CURRENCY.

) Misc. Case No. _____
)
) JUDGE _____
)
) STIPULATION TO EXTEND TIME
) FOR THE UNITED STATES TO
) FILE A JUDICIAL COMPLAINT IN
) FORFEITURE

JUDGE GWIN

The parties to the above-referenced matter, the United States of America and Claimants Christin Anderson and Kevin Body (hereinafter collectively referred to as the "Parties"), each by undersigned counsel, or by authorized representative, agree as follows:

1. The above-captioned asset, (hereinafter referred to as "the Seized Currency"), was seized by the Drug Enforcement Administration ("DEA") on September 29, 2017, during the execution of a search warrant.
2. The DEA initiated administrative forfeiture proceedings against the Seized Currency. Claimants Christin Anderson and Kevin Body filed a claim for the Seized Currency on November 29, 2017. The DEA did not receive any further valid claims contesting the administrative forfeiture of the Seized Currency.
3. Under 18 U.S.C. § 983(a)(3)(A), the United States must file a judicial complaint in forfeiture against a seized asset not later than 90 days after a valid administrative claim for the seized asset is filed. However, 18 U.S.C. § 983(a)(3)(A) also provides that a court may extend the period for filing a complaint for good cause shown or upon agreement of the parties.
4. Pursuant to 18 U.S.C. § 983(a)(3)(A), and absent an extension of time, the deadline for the United States to file a judicial complaint in forfeiture with respect to the Seized Currency is February 27, 2018.
5. Christin Anderson and Kevin Body are represented by Thomas A. Sobecki, Esq., 405 Madison Avenue, Suite 910, Toledo, Ohio 43604. The Parties need additional time to discuss a possible resolution of the matter. Accordingly, the Parties wish to extend the time for the United States to file a judicial complaint in forfeiture against the Seized Currency by 90 days, from February 27, 2018, to May 28, 2018.

STIPULATION TO EXTEND TIME FOR THE UNITED STATES TO FILE A JUDICIAL COMPLAINT IN FORFEITURE (Cont.)

6. The persons signing this Stipulation to Extend Time warrant and represent that they possess full authority to bind the persons or entities on whose behalf they are signing and that they are unaware of any other potential claimants to the Seized Currency.

7. With respect to the Seized Currency, the Parties agree to an extension of the period for filing a judicial complaint in forfeiture to **May 28, 2018**.

/s/Thomas A. Sobecki (by phone consent)

Executed this 23rd day of February, 2018

Thomas A. Sobecki, Esq.
405 Madison Avenue, Suite 910
Toledo, Ohio 43604
Phone: (419) 242-9908

Attorney for Claimants Christin
Anderson and Kevin Body

/s/Phillip J. Tripi

Executed this 23rd day of February, 2018

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Attorney for the United States

IT IS SO ORDERED:

United States District Court Judge

Date